

***United States Court of Appeals  
for the Second Circuit***



**APPELLANT'S  
REPLY BRIEF**





4-13-77  
No. 76-7614

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT, N. Y.

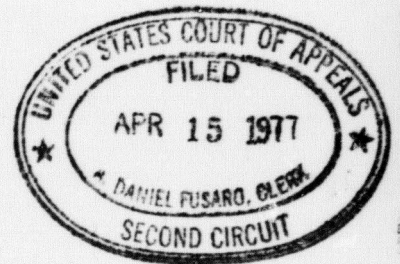
KENIL K. GOSS,  
Plaintiff-Appellant Pro Se

v.

REVILON, INCORPORATED and its  
wholly owned subsidiary, USV  
PHARMACEUTICAL CORPORATION,

Defendants-Appellees

DISCRIMINATION APPEAL FROM THE  
U. S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK



THE PLAINTIFF-APPELLANT'S

REPLY BRIEF

DATE: Wednesday, April 13, 1977

Delivered Personally by the  
Plaintiff-Appellant Today.

Kenil K. Goss

Plaintiff-Appellant Pro Se

K. K. GOSS  
THE GENTRY, APARTMENT 618  
21 FAIRVIEW AVENUE  
TUCKAHOE, WESTCHESTER, N. Y. 10707  
U. S. A.  
TELEPHONE (914) 793-4661

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Abraham & Green  
Attorneys for Appellees

No. 76-7614

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FOR THE SECOND CIRCUIT, N. Y.

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THE PLAINTIFF-APPELLANT'S REPLY BRIEF

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ABBREVIATIONS USED IN THIS REPLY BRIEF

- ( 1) CCH = Commerce Clearing House, Inc., Chicago, Illinois,  
topical law publisher, including EPD below.
- ( 2) EEOC = Equal Employment Opportunity Commission.
- ( 3) EPD = "Employment Practices Decisions", published by  
CCH above, containing reported court cases  
(mainly Federal) on employment discrimination.
- ( 4) FRAP = Federal Rules of Appellate Procedure (1972 Edition).
- ( 5) FRCP = Rules of Civil Procedure For the United States  
District Courts (1971 Edition).
- ( 6) SDNY = United States District Court For the Southern  
District of New York.
- ( 7) U.S.C. = United States Code (1971 Edition).
- ( 8) USDC = United States District Court.

OTHER ABBREVIATIONS

- ( 9) Defendants = Defendants-Appellees in the present case at bar.
- (10) Plaintiff = Plaintiff-Appellant Pro Se and the members of  
his class, whom he has been representing,  
in the present suit at bar.
- (11) Title VII = Title VII of the Civil Rights Act of 1964, as  
amended by the Equal Employment Opportunity  
Act of 1972.
- (12) 1981 claim = Claim under 42 U.S.C. 1981 (the Civil Rights Act  
of 1866, as amended by the Civil Rights Act  
of 1870).



# UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION

REPORT OF INVESTIGATION
DATE: 10/10/1964
BY: SA [REDACTED]
TO: SAC, NEW YORK
FROM: SAC, NEW YORK
SUBJECT: [REDACTED]

100-100000

## RE: [REDACTED]

### MEMORANDUM FOR THE DIRECTOR

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THE UNIVERSITY OF MICHIGAN LIBRARY

RESEARCH REPORTS

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SECRET

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~~Page 4, SECTION TWO, PARAGRAPH ONE, LINE SEVEN~~

The following information was obtained from the records of the  
 Department of the Interior, Bureau of Land Management, for the  
 period from 1900 to 1909, inclusive, and is being furnished  
 for your information. The records show that the following  
 lands were patented to the United States for the purpose of  
 establishing a reservation for the use of the Indians of the  
 Navajo and Hopi Tribes, to-wit:

Section	Township	Range	County	State	Year
36	10 N.	10 E.	Navajo	N.M.	1900
37	10 N.	10 E.	Navajo	N.M.	1900
38	10 N.	10 E.	Navajo	N.M.	1900
39	10 N.	10 E.	Navajo	N.M.	1900
40	10 N.	10 E.	Navajo	N.M.	1900
41	10 N.	10 E.	Navajo	N.M.	1900
42	10 N.	10 E.	Navajo	N.M.	1900
43	10 N.	10 E.	Navajo	N.M.	1900
44	10 N.	10 E.	Navajo	N.M.	1900
45	10 N.	10 E.	Navajo	N.M.	1900
46	10 N.	10 E.	Navajo	N.M.	1900
47	10 N.	10 E.	Navajo	N.M.	1900
48	10 N.	10 E.	Navajo	N.M.	1900
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64	10 N.	10 E.	Navajo	N.M.	1900
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99	10 N.	10 E.	Navajo	N.M.	1900
100	10 N.	10 E.	Navajo	N.M.	1900

The above lands were patented to the United States for the purpose of  
 establishing a reservation for the use of the Indians of the  
 Navajo and Hopi Tribes, to-wit:

Section	Township	Range	County	State	Year
36					





[illegible]

United States v. Brown and Lee, No. 73-13, 1981, 2nd Circuit, Apr. 13, 1977  
dated November 2, 1976, particularly the item (iv)(3) on pg. 14 x  
26, and a comma change of Judicial discretion is a plus on the  
first page of the written judgment.

(b)(7) [REDACTED]

[illegible][illegible]



[The following text is heavily blurred and illegible. It appears to be a multi-paragraph document with approximately 25 lines of text.]







[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



CHAPTER 1

The first part of the book discusses the history of the United States and the role of the federal government. It covers the early years of the nation, the growth of the federal government, and the challenges it has faced over time. The author argues that the federal government has played a crucial role in the development of the United States, and that its power should be preserved and strengthened.

The second part of the book discusses the role of the federal government in the economy. It covers the history of federal intervention in the economy, the impact of federal policies on the economy, and the challenges of economic growth. The author argues that the federal government has played a crucial role in the development of the United States economy, and that its power should be preserved and strengthened.

The third part of the book discusses the role of the federal government in social policy. It covers the history of federal intervention in social policy, the impact of federal policies on social policy, and the challenges of social policy. The author argues that the federal government has played a crucial role in the development of the United States, and that its power should be preserved and strengthened.

The fourth part of the book discusses the role of the federal government in foreign policy. It covers the history of federal intervention in foreign policy, the impact of federal policies on foreign policy, and the challenges of foreign policy. The author argues that the federal government has played a crucial role in the development of the United States, and that its power should be preserved and strengthened.

100

[REDACTED]

101

[REDACTED]



SECRET

1. The purpose of this document is to provide information regarding the activities of the [redacted] in the [redacted] area. The information is classified as [redacted] and is to be controlled in accordance with the [redacted] policy.

2. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

3. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

4. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

5. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

6. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

7. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

8. The [redacted] has been identified as a [redacted] of the [redacted] and is being monitored for [redacted] activities. The [redacted] is being monitored for [redacted] activities.

THE FOLLOWING INFORMATION IS FOR YOUR INFORMATION ONLY

1. THE FIRST PART OF THE REPORT IS A SUMMARY OF THE RESULTS OF THE SURVEY. IT IS INTENDED TO BE A CONCISE STATEMENT OF THE FACTS AND TO BE USED AS A BASIS FOR DISCUSSION AND ACTION.

2. THE SECOND PART OF THE REPORT IS A DETAILED ACCOUNT OF THE SURVEY. IT IS INTENDED TO BE A COMPLETE AND ACCURATE RECORD OF THE SURVEY AND TO BE USED AS A BASIS FOR DISCUSSION AND ACTION.

3. THE THIRD PART OF THE REPORT IS A SUMMARY OF THE RESULTS OF THE SURVEY. IT IS INTENDED TO BE A CONCISE STATEMENT OF THE FACTS AND TO BE USED AS A BASIS FOR DISCUSSION AND ACTION.

4. THE FOURTH PART OF THE REPORT IS A DETAILED ACCOUNT OF THE SURVEY. IT IS INTENDED TO BE A COMPLETE AND ACCURATE RECORD OF THE SURVEY AND TO BE USED AS A BASIS FOR DISCUSSION AND ACTION.

5. THE FIFTH PART OF THE REPORT IS A SUMMARY OF THE RESULTS OF THE SURVEY. IT IS INTENDED TO BE A CONCISE STATEMENT OF THE FACTS AND TO BE USED AS A BASIS FOR DISCUSSION AND ACTION.













1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861.

2. The second part is a report from the Secretary of the Treasury, dated January 1, 1861.

3. The third part is a report from the Secretary of the Interior, dated January 1, 1861.

4. The fourth part is a report from the Secretary of the Navy, dated January 1, 1861.

5. The fifth part is a report from the Secretary of the War, dated January 1, 1861.

6. The sixth part is a report from the Secretary of the State, dated January 1, 1861.

7. The seventh part is a report from the Secretary of the War, dated January 1, 1861.

8. The eighth part is a report from the Secretary of the Navy, dated January 1, 1861.

9. The ninth part is a report from the Secretary of the Interior, dated January 1, 1861.

10. The tenth part is a report from the Secretary of the Treasury, dated January 1, 1861.

11. The eleventh part is a report from the Secretary of the War, dated January 1, 1861.

12. The twelfth part is a report from the Secretary of the State, dated January 1, 1861.

13. The thirteenth part is a report from the Secretary of the War, dated January 1, 1861.

14. The fourteenth part is a report from the Secretary of the Navy, dated January 1, 1861.

15. The fifteenth part is a report from the Secretary of the Interior, dated January 1, 1861.

16. The sixteenth part is a report from the Secretary of the Treasury, dated January 1, 1861.

17. The seventeenth part is a report from the Secretary of the War, dated January 1, 1861.

18. The eighteenth part is a report from the Secretary of the State, dated January 1, 1861.

19. The nineteenth part is a report from the Secretary of the War, dated January 1, 1861.

20. The twentieth part is a report from the Secretary of the Navy, dated January 1, 1861.

21. The twenty-first part is a report from the Secretary of the Interior, dated January 1, 1861.

22. The twenty-second part is a report from the Secretary of the Treasury, dated January 1, 1861.

23. The twenty-third part is a report from the Secretary of the War, dated January 1, 1861.

24. The twenty-fourth part is a report from the Secretary of the State, dated January 1, 1861.

25. The twenty-fifth part is a report from the Secretary of the War, dated January 1, 1861.

26. The twenty-sixth part is a report from the Secretary of the Navy, dated January 1, 1861.

27. The twenty-seventh part is a report from the Secretary of the Interior, dated January 1, 1861.

28. The twenty-eighth part is a report from the Secretary of the Treasury, dated January 1, 1861.

29. The twenty-ninth part is a report from the Secretary of the War, dated January 1, 1861.

30. The thirtieth part is a report from the Secretary of the State, dated January 1, 1861.

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

WITNESSETH MY HAND AND SEAL OF OFFICE this 10th day of May, 1964.

470

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

471

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

472

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

473

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

474

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.

475

THE UNITED STATES OF AMERICA, DISTRICT OF COLUMBIA, ss. I, the undersigned, Clerk of the said District, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the said District.















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